

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA

v.

FREDY FABIAN ALFARO

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Case No. 1:19-cr-260-TSE

The Honorable T. S. Ellis

DEFENDANT'S MOTION FOR LEAVE TO FILE POSITION ON SENTENCING AND  
RELATED EXHIBITS UNDER SEAL

Comes Now, Defendant, by counsel, and pursuant to Local Criminal Rule 49(e) respectfully moves this Court to permit the Defendant to file his Position on Sentencing and related exhibits under seal. Sealing of the Position on Sentencing and its exhibits is necessary where it references discovery governed by the protective order in this case (Doc. No. 35), discusses sensitive information concerning childhood trauma suffered by the Defendant and family members, and references a sealed document (Doc. No. 115).

A proposed Order is attached hereto.

Respectfully Submitted,  
FREDY FABIAN ALFARO  
By Counsel

/s/ Joseph King  
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**CERTIFICATE OF SERVICE**

I certify that a copy of this pleading was filed with the ECF system on November 2, 2020, which will send notice to counsel of record.

/s/ Joseph King

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